

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

IN RE: § CASE NO. 10-51383-LMC
§
INTERNATIONAL FILTER §
SOLUTIONS, INC., §
§
DEBTOR. § CHAPTER 7 PROCEEDING

CHAPTER 7 TRUSTEE'S MOTION TO SELL OR ABANDON DEBTOR'S PERSONAL
PROPERTY FREE AND CLEAR OF ALL LIENS AND INTERESTS
(WITH 21-DAY LANGUAGE)

**THIS PLEADING REQUESTS RELIEF THAT MAY BE ADVERSE TO YOUR
INTERESTS.**

**IF NO TIMELY RESPONSE IS FILED WITHIN TWENTY-ONE (21) DAYS FROM THE
DATE OF SERVICE, THE RELIEF REQUESTED HEREIN MAY BE GRANTED
WITHOUT A HEARING BEING HELD.**

A TIMELY FILED RESPONSE IS NECESSARY FOR A HEARING TO BE HELD.

NOW COMES RANDOLPH N. OSHEROW, Chapter 7 Trustee ("Trustee") of the
bankruptcy estate of International Filter Solutions, Inc., and files his Motion to Sell or Abandon
Debtor's Personal Property Free and Clear of All Liens and Interests. The Trustee would show
the Court the following:

1. On April 9, 2010 a voluntary petition was filed initiating this case under Chapter
7 of the Bankruptcy Code. On April 9, 2010 Randolph N. Osherow was appointed Chapter 7
Trustee of Debtor's estate and continues to act in that capacity.

2. The Trustee hereby offers for sale the bankruptcy estate's interest in the Debtor's
interest, if any, in Hydro Composites LLC, a company that was a supplier to Debtor, and that
appears to be an alter ego of the Debtor, as well as the accounts receivable booked by the Debtor,

owed by Hydro Composites, LLC to the Debtor. This account receivable now is disputed by the Debtor.

Said property is to be sold AS IS and WHERE IS. The Debtor included these assets on its schedules for an unknown value. Additional information on these assets is available upon written request to Randolph N. Osherow, Trustee, 342 W. Woodlawn, Suite 100, San Antonio, TX 78212.

3. If no bids are received for at least \$5,000.00 by 5:00 p.m. on June 21, 2010, the Court may approve the abandonment of this property.

4. Parties who wish to make a bid on the bankruptcy estate's interest in the above-described property, if any, are advised to file a response to this Motion or notify the Trustee within twenty-one (21) days of the date of this motion. In the event no response is filed with the Clerk or received by the Trustee, the bankruptcy estate's interest in the personal property, if any, may be abandoned as provided by §554 of Title 11 by Notice by the Chapter 7 Trustee.

5. A copy of this Motion has been forwarded to all interested parties in accordance with Local Rule 9014 and all third parties that have requested notice of the sale of bankruptcy estate assets.

Respectfully submitted this 1st day of June 2010.

/s/ Randolph N. Osherow
RANDOLPH N. OSHEROW, Chapter 7 Trustee
Texas Bar No. 15335500
342 West Woodlawn, Suite 100
San Antonio, Texas 78212
(210) 738-3001 - Telephone
(210) 737-6312 - Telefax
rosherow@hotmail.com

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

IN RE: § CASE NO. 10-51383-LMC
§
INTERNATIONAL FILTER §
SOLUTIONS, INC., §
§
DEBTOR. § CHAPTER 7 PROCEEDING

CERTIFICATE OF MAILING

The undersigned hereby certifies that a true and correct copy of his Motion to Sell or Abandon Debtor's Personal Property Free and Clear of All Liens and Interests has been served upon the following parties in interest by U.S. first class mail, postage prepaid, this 1st day of June 2010:

International Filter Solutions, Inc.
c/o Chance M. McGhee
Davis Law Firm
909 NE Loop 410, Suite 100
San Antonio, TX 78209
Debtor(s)

Chance M. McGhee
Davis Law Firm
909 N.E. Loop 410, Suite 100
San Antonio, TX 78209
Counsel for Debtor(s)

U.S. Trustee
P.O. Box 1539
San Antonio, TX 78295-1539

Mary K. Viegelahn
909 NE Loop 410, Suite 400
San Antonio, TX 78209
Chapter 13 Trustee

SEE ATTACHED MATRIX FOR LIST OF ALL INTERESTED PARTIES NOTICED.

/s/ Randolph N. Osherow
RANDOLPH N. OSHEROW, Chapter 7 Trustee
Texas Bar No. 15335500
342 West Woodlawn, Suite 100
San Antonio, Texas 78212
(210) 738-3001 - Telephone
(210) 737-6312 - Telefax
rosherow@hotmail.com

INTERNAL REVENUE SERVICE
CENTRALIZED INSOLVENCY OPERATIONS
PO BOX 21126
PHILADELPHIA PA 19114-0326

3-D Welding & Industrial Supply, Inc.
3016 Highway 123
San Marcos, TX 78666-9777

AMC Industries
P.O. Box 171290
San Antonio, TX 78217-8290

Aquatic Eco Systems
2395 Apopka Blvd. Ste. 100
Apopka, FL 32703-7785

AT&T
P.O. Box 5001
Carol Stream, IL 60197-5001

Australian Global Services
Injection Plastics Mfg Co.
P.O. Box 380
Lapaz IN 46537-0380

Bead Filters International
5261 Highland Rd., #345
Baton Rouge, LA 70808-6547

Bow Tie, Inc.
P.O. Box 57900
Los Angeles, CA 90057-0900

Broadway National Bank
1177 NE Loop 410
P.O. Box 171250
San Antonio, TX 78217-8250

Burton R. Nicols
c/o Angela D. Nickel
105 E. Gonzales Street, #205
Seguin, TX 78155-5603

Chase
P.O. Box 15298
Wilmington, DE 19850-5298

Community Development Loan Fund, Inc.
225 West Poplar
San Antonio, TX 78212-5549

Diamond Plastics, Inc.
211 West Geneva St.
P.O. Box 99
Dunkirk OH 45836-0099

Employers Assurance Co.
115 Wild Basin Rd. South, Ste. 200
Austin, TX 78746-3303

Guadalupe County Tax Office
P.O. Box 70 (307 W. Court)
Seguin, TX 78156-0070

Guadalupe Valley Electric Cooperative
P.O. Box 118
Gonzales, TX 78629-0118

Hanor, Lively & Cernyar PLLC
750 Rittiman Road
San Antonio, TX 78209-5500

Herren Enterprises
46714 254th
Crooks, SD 57020-5815

International Filter Solutions, Inc.
13636 W IH 10
Marion, TX 78124-6583

James S. Frost
Attorney at Law
113 West Gonzales
Seguin, Texas 78155-5630

Kasco Marine, Inc.
800 Deere Rd.
Prescott, WI 54021-1241

Key Instruments
250 Andrews Rd.
Trevose, PA 19053-3428

Koi USA
10292 Bouvias Rd.
Anaheim, CA 92804-5614

L.F. Manufacturing, Inc.
P.O. Box 578
Giddings, TX 78942-0578

MDM, Inc. / Sequence Pumps, Inc.
325 Karen Lane
Colorado Springs, CO 80907-5128

MSC
28551 Laura Court
Elkhart, IN 46517-1179

Natvar
19555 E. Arenth Ave.
City of Industry, CA 91748-1403

NDS, Inc.
6228 Reliable Parkway
Chicago, IL 60686-0001

Nichols, Burton K.
3136 Bolton Rd.
Marion, TX 78124-6002

Office Depot
P.O. Box 689020
Des Moines, IA 50368-9020

Performance Pro Pumps, Inc.
5976 SE Alexandar St., Ste. F
Hillsboro OR 97123-8516

Praxair Distribution, Inc.
550 Springfield Rd.
San Antonio, TX 78219-1881

Process Technology
7010 Lindsay Dr.
Mentor, OH 44060-4921

Ronald F. Malone
3218 Riverwalk Drive
Baton Rouge, LA 70820-4341

Ryan Herco
3010 North San Fernando Blvd.
Burbank, CA 91504-2524

Sam D. Milsap, Jr.
10999 IH 10 West, Suite 800
San Antonio, TX 78230-1349

Savard Plumbing Co.
Dept. LA 21074
Pasadena, CA 91185-0001

Southeastern Freight Lines
c/o RMS Bankruptcy Recovery Services
P.O. Box 5126
Timonium, Maryland 21094-5126

Undertoe L.L.C.
c/o Angela D. Nickel
105 E. Gonzales Street, #205
Seguin, TX 78155-5603

Undertoe, LLC
13636 W. IH 10
Marion, TX 78124-6583

United States Attorney
Taxpayer Division
601 N.W. Loop 410, Suite 600
San Antonio, TX 78216-5512

United States Attorney General
Main Justice Bldg., Rm 5111
10th & Constitution Ave., N.W.
Washington, D.C 20530-0001

Weiss-Rohlig USA, LLC
351 W. Touhy Ave., Suite 100
Des Plaines, IL 60018-6215

William B. Kingman, Attorney at Law
4040 Broadway #450
San Antonio, TX 78209-6350

Williams Supply Company
P.O. Box 65054
San Antonio, TX 78265-5054

Wolverine Electrical Contractors, Inc.
102 Woodcrest
San Antonio, TX 78209-2933

YRC Inc
P.O. Box 111
Akron, OH 44393-0001